HEARING DATE: DECEMBER 22, 2009

HEARING TIME: 10:00 A.M.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: OLGA D. PAREDES

ssn: ***-**-6072

Debtor.

CASE NO. 09-22261 RDD

NOTICE OF MOTION

PLEASE TAKE NOTICE: that a Motion will be made before the Honorable Robert D. Drain on the 22nd day of December 2009 at 10:00 a.m. at the Southern District Bankruptcy Court located at 300 Quarropas Street, White Plains, NY 10601 for an order expunging unsecured claim 1 filed by Department Stores National Bank/Macys, unsecured claims 6, 7, and 12 filed by PRA Receivables Management, LLC and unsecured claim 9 filed by Roundup Funding, LLC.

PLEASE TAKE FURTHER NOTICE: that any response to the Motion must be made and received by counsel for the Debtor's with a copy to Chambers on or before December 13, 2009.

DATED: November 18, 2009

New York, New York

DAVID B. SHAEV (dbs6994)

Attorney for Debtor

350 Fifth Avenue, Suite 7210 New York, New York 10118

(212) 239-3800

TO:

Jeffrey L. Sapir Chapter 13 Trustee 399 Knollwood Road Suite 102 White Plains, NY 10603

United States Department of Justice Office of the United States Trustee Southern District of New York 33 Whitehall Street, 21st Floor New York, NY 10004 Department Stores National Bank/Macys TSYS Debt Management P.O. Box 137 Columbus, GA 31902-0137 Attention: Stacy Suire

Roundup Funding MS 550 P.O. Box 91121 Seattle, WA 98111-9221 Attention: Steven G. Kane

PRA Receivables Management, LLC P.O. Box 41067 Norfolk, VA 23541 Attention: Dolores Garcia